

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

APPLETON PAPERS INC. and)	
NCR CORPORATION,)	
)	
Plaintiffs,)	
v.)	No. 08-CV-16-WCG
)	
GEORGE A. WHITING PAPER)	
COMPANY, et al.,)	
)	
Defendants.)	

**DECLARATION OF OMID H. NASAB, ESQ., IN SUPPORT OF
PLAINTIFF NCR CORPORATION'S MOTION IN LIMINE TO EXCLUDE EVIDENCE
ON DEFENDANTS' NEW THEORY THAT NCR, THROUGH ITS OWN ACTS,
ARRANGED FOR THE DISPOSAL OF ACPC'S BROKE**

I, OMID H. NASAB, declare as follows:

1. I am an associate with the law firm of Cravath, Swaine & Moore LLP, and I am one of the attorneys representing Plaintiff NCR Corporation ("NCR") in the above-captioned action. I am admitted to practice in the Eastern District of Wisconsin.

2. I submit this declaration in support of NCR's Motion in Limine to Exclude Evidence on Defendants' New Theory that NCR, Through its Own Acts, Arranged for the Disposal of ACPC's Broke.

3. Attached hereto as Exhibit 1 is a true and correct copy of Georgia-Pacific Consumer Products LP's (f/k/a Fort James Operating Company's), Fort James Corporation's and Georgia-Pacific LLC's Rule 26(a)(1) Initial Disclosures, dated October 20, 2008.

4. Attached hereto as Exhibit 2 is a true and correct copy of Georgia-Pacific Consumer Products LP's (f/k/a Fort James Operating Company's), Fort James Corporation's and Georgia-Pacific LLC's Supplement to Rule 26(a)(1) Initial Disclosures, dated August 28, 2009.

5. Attached hereto as Exhibit 3 is a true and correct copy of Georgia-Pacific Consumer Products LP's (f/k/a Fort James Operating Company's), Fort James Corporation's and Georgia-Pacific LLC's Second Supplement to Rule 26(a)(1) Initial Disclosures, dated September 14, 2011.

6. Attached hereto as Exhibit 4 is a true and correct copy of Defendant Menasha Corporation's Responses and Objections to Plaintiff NCR Corporation's Requests for Admission and Interrogatories, dated November 4, 2011.

7. Attached hereto as Exhibit 5 is a true and correct copy of U.S. Paper Mills Corporation's Response to Plaintiff NCR Corporation's Requests for Admission and Interrogatories to Defendant U.S. Paper Mills Corporation, dated November 4, 2011.

8. Attached hereto as Exhibit 6 is a true and correct copy of Defendant Georgia-Pacific LLC's First Set of Interrogatories and Second Request for the Production of Documents to Plaintiff NCR Corporation, dated July 21, 2011.

9. Attached hereto as Exhibit 7 is a true and correct copy of the Notice of Deposition for Dale Schumaker, dated October 11, 2011.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 1, 2011.

/s/ Omid H. Nasab
Omid H. Nasab

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2012, I electronically filed the Declaration of Omid H. Nasab, Esq., in Support of Plaintiff NCR Corporation's Motion in Limine to Exclude Evidence on Defendants' New Theory That NCR, Through its Own Acts, Arranged for the Disposal of ACPC's Broke using the ECF system, which will send notification of such filing by operation of the Court's electronic systems. Parties may access this filing via the Court's electronic system.

_____/s/ Omid H. Nasab_____
Omid H. Nasab